

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re No. 13-53846  
CITY OF DETROIT, MICHIGAN, Chapter 9  
Debtor. HON. STEVEN W. RHODES

**EXHIBIT 35**

**APPELLEE STATE OF MICHIGAN'S DESIGNATION OF  
ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL**  
in connection with Notice of Appeal filed by Lucinda Darrah  
[Dkt. #8812]

<b>Item</b>	<b>Date Filed</b>	<b>Docket Number</b>	<b>Description</b>
35	8/21/2014	6957	The Emergency Manager Kevyn Orr File Bankruptcy To Avoid Paying A Debts To Syncora And Should Be Dismiss, Filed by Creditors Hassan Aleem , Lucinda J. Darrah , Wayne D. Bernard , Mark Burton , Marie Lynette Thornton, Thelma Milledge , Roxanne Watson , Keith M. Hines, Vera C. Magee , Tijuana Morris , Dorothea Harris , Barbara Yee , Douglas Yee , Carl Williams and H. Dunn

FILED 08/21/2014 PM 3:20

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

U.S. BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN

CARL WILLIAMS AND HASSAN ALEEM  
Creditor

v

In re:  
**CITY OF DETROIT, MICHIGAN  
AND EMERGENCY MANAGER  
KEVYN D. ORR**

Chapter 9  
 Case No. 13-53846  
 Hon: Steven W. Rhodes

Debtor

**THE EMERGENCY MANAGER KEVYN ORR FILE BANKRUPTCY TO  
AVOID PAYING A DEBTS TO SYNCORA AND SHOULD BE DISMISS**

THE FOURTH AMENDMENT NOTICE WAS AFTER THE FACT, AND THERE  
 WAS NO FIFTH AMENDMENT NOTICE, IT WAS UNTIMELY, CONTRARY TO  
 THE FACTS AND LAW MISREPRESENTATION OF THE BANKRUPTCY CODE  
 AND RULES AND HAS NOT BEEN PRESENTED IN A GOOD FAITH MANNER.

We /I object to the Fourth and Fifth Amended Plan of Adjustments  
 and any confirmation of the Plans of Adjustment and the process for the  
 following reasons:

We object because (1) the Emergency Manager, Kevyn Orr went to Wayne  
 County Circuit Court to get an injunction to stop payment on Casino Revenues



(2) Syncora went to Federal Court in New York and was transferred to the District court to have the injunction lifted. Syncora alleged that the Swap Counterparties may not exercise any optional right of termination of the Swap Contracts at the City's direction, as envisaged by the Forbearance and Optional Termination Agreement (FOTA) without Syncora's prior written consent. Syncora sought declaratory and injunctive relief, including a declaration that the Swap Counterparties may not terminate the Swap Contract without Syncora's consent (and that any such termination will be void ab initio) and an injunction permanently enjoining the Swap Counterparties from terminating the Swap contracts. (3) The Emergency Manager, Kevyn Orr to avoid paying Syncora filed for bankruptcy as stated in the Fourth Amended Plan of Adjustment with the exception of stating Kevyn Orr filed bankruptcy to avoid payment that is a violation of the Bankruptcy Code and demonstrate it was not filed in good faith as required 11 USC 109 (c) and 921 of the bankruptcy code and should be dismiss.

I/We hereby certify that the statements made herein are true and correct to the best of my knowledge and belief, under penalty of perjury and contempt of Court under the laws of the United States of America.

Sign Carl Williams

Address 10112 Somerset

City, State, & Zip Detroit Michigan 48224

Date August 9, 2014

Sign Douglas Yee

Address 4245 Commonwealth

City, State, & Zip DETROIT MI 48208

Date 8-9-14

Sign Barbara Yee

Address 4245 Commonwealth

City, State, & Zip DETROIT MI 48208

Date 8-9-14

Sign Dawisha Harris

Address 20552 Huntington

City, State, & Zip HARPER WOODS MI, 48225

Date 08/09/14

Sign Juanita Morris

Address 14841 Toy Rd.

City, State, & Zip Detroit MI 48238

Date 8-9-14

Sign Kathy M. H.

Address 832 CHALMERS

City, State, & Zip DET, MICH 48215

Date 8/9/14

Sign Vera C Magee

Address 5165 IROQUOIS

City, State, & Zip DETROIT, MI 48213

Date 8-9-14

Sign Broanne Watson

Address 18424 Curbs

City, State, & Zip DET, MI, 48219

Date 8/9/14

Sign Thelma McCloud

Address 15075 Appoline St

City, State, & Zip DET Michigan 48227

Date 8/9/2014

Sign Mark Burton

Address 2920 Norwich Rd.

City, State, & Zip Lansing, MI 48911

Date 8-9-14

Sign Marie Lynette Thornton

Address 99 E. Frost Apt 909

City, State, & Zip Detroit, Michigan

Date 8-9-2014

Sign Ch. Allen

Address 12225 Parkside

City, State, & Zip Detroit, MI 48221

Date 9/24/14

Sign Wayne A. Bernard

Address 13650 Wadsworth

City, State, & Zip Detroit, Michigan 48227

Date 8-9-2014

Sign Cindy Donoh

Address 492 Peterboro

City, State, & Zip Detroit, Mi 48201

Date 8/19/14

Sign Hassan Alsaem

Address 2440 Taylor

City, State, & Zip DETROIT, MI 48206

Date \_\_\_\_\_

Sign \_\_\_\_\_

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City, State, & Zip \_\_\_\_\_

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City, State, & Zip \_\_\_\_\_

Date \_\_\_\_\_

DETROIT

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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

CARL WILLIAMS AND HASSAN ALEEM  
Creditors/Objectors,

v

In re:	Chapter 9
CITY OF DETROIT, MICHIGAN	Case No. 13-53846
AND EMERGENCY MANAGER	Judge Steven W Rhodes
KEVYN D. ORR	
Debtor/City of Detroit	Case No. 14-cv-10434
	Hon. Bernard A. Friedman
	Magistrate Paul J. Komives

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**PROOF OF SERVICES**

Carl Williams, being first duly sworn deposes and  
your name

Say that on August 21 2014. I sent a copy of The Emergency Manager  
Kevyn Orr file bankruptcy to avoid paying a debts to Syncora and should be  
dismiss, Upon the concern parties by certified mail at the following address:

City of Detroit  
Corporation Council  
First National Building  
600 Woodward Ave  
Detroit, Michigan 48226

Emergency Manager  
Kenyn Orr  
Coleman A Young Municipal Center  
2 Woodward 11th floor  
Detroit, Michigan 48226

I/We hereby certify that the statements made herein are true and correct to the best of my knowledge and belief, under penalty of perjury and contempt of Court under the laws of the United States of America.

Sign Carl W. Williams

Dated August 21, 2014